

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

BENJAMIN PAYNE ELLIS
CREDITOR

V.

PURDUE PHARMA L.P. et, al,
DEBTORS

CHAPTER 11

CASE NO: 19-23649 (RMD)

EXCUSABLE NEGLIGENCE

LATE CLAIMS MOTION

BE RECOGNIZED AS

BEING TIMELY

COMES NOW, BENJAMIN PAYNE ELLIS, REQUESTING

FOR CREDITORS LATE CLAIMS BE RECOGNIZED

AS BEING FILED TIMELY UNDER FEDERAL

RULE OF BANKRUPTCY PROCEDURE 9006(b)(1)

EXCUSABLE NEGLIGENCE SHOULD BE APPLIED

TO CREDITOR FOR THE FOLLOWING SITUATIONS

ARE OUT OF CREDITORS CONTROL

FILED
U.S. BANKRUPTCY COURT
2021 JUN 21 P 14
S.D. OF N.Y.

1.) THE GLOBAL PANDEMIC HAS STOPPED ALL INTERACTIONS WITH THOSE IN THE COMMUNITY AND LIMITED THE CREDITORS ABILITY TO COMMUNICATE AND GATHER INFORMATION THAT WOULD NOT NORMALLY HAVE BEEN A BARRIER IF NOT FOR THE COVID-19. THIS REASON ALONE IS AN ACT OF GOD WHICH IS OUT OF THE CREDITORS CONTROLL.

2.) I HAVE BEEN INCARCERATED SINCE 01-01-2020. ALL ACCESS TO INFORMATION IS LIMITED AND ALL INFORMATION THAT COMES INTO JAIL IS CONTROLLED BY AN OFFICER. WE ARE ONLY ALLOWED CERTEN PUBLICATIONS, WHICH

THE JAIL MUST APPROVE OF TIME OUT OF

THE CELL IS VERY LIMITED TO NEW RESTRICTIONS

SO TIME TO SPEAK ON THE PHONE IS MINIMAL.

THE PANDEMIC HAS HALTED ALL COMMUNICATIONS

AND CONTACT WITH PEOPLE PREVENTING ME

FROM FILING ON TIME.

THE RELIEF SOUGHT HERE IS PROPER
AS THIS IS RISING OUT OF THE SOUTHERN
DISTRICT OF NEW YORK AND PURSUANT
TO 28 U.S.C. §§ 1408 AND 1409
FOR THE REASONS AS BEFORE MENTIONED
I BEG THIS COURT FOR THE RELIEF
SOUGHT.

BENJAMIN PAYNE ELLIS
06-15-2021

Benjamin Payne Ellis

ADDRESS: BENJAMIN PAYNE ELLIS #898237
96 WASHINGTON CORRECTIONS CENTER
P.O. BOX 900 (R-5-B-6-L)
SHELTON, WA 98584